

Date: 14th November 2025

Our ref: 2025_11_10-647

Dear Sir or Madam,

Written representation made by Eastern Inshore Fisheries and Conservation Authority (IFCA):

Provided for deadline 1 - 18th November 2025

Please note: Eastern IFCA's representation is limited to matters that could affect the Eastern IFCA district (0-6nm between Haile Sand Fort in the north to Felixstowe in the south).

1. Impacts to fishing activity:

- 1.1. As the cable route making landfall in Suffolk crosses the Eastern IFCA district, it is of key concern that cable works will impact inshore fishing activities. Activities in this area include potting (crab, lobster and whelk), netting (both set and drift nets for a variety of species including herring and bass), and both bottom and midwater trawling. Activities that occur to a lesser extent include longlining, handlining and shrimp beam trawling. These activities have the potential to be impacted either through displacement during works, damage or loss of gear due to snagging, or indirectly through impacts to important benthic habitats. It is important that these impacts are minimized through early consultation and dialogue with local industry members.
- 1.2. Many of the fishers operating within the 6nm limit are small (<12m) vessels operating at a local scale with a high level of reliance on local fishing grounds. These vessels may be disproportionately affected by displacement or damage to fishing grounds compared to larger vessels with higher capacity to travel further to avoid cable works. Some of the most commonly deployed gear types in this area of the Eastern IFCA district are static gear types, including pots and static nets. As identified in the applicants Environmental Statement (Part 4, Chapter 8 – Commercial Fisheries), there is greater potential for impact on static gears than mobile ones. This is partially due to static methods relying on more specific fishing grounds based on habitat and suitability, while mobile gears such as trawling have more capacity to adapt the location of their fishing when cable works are occurring. Additionally, static gear needs to be moved away from the area of construction entirely, potentially excluding fishers from their fishing grounds temporarily and increasing costs as fishers may need to make extra trips to move gear or travel further to set gear out of the way of works. The applicant identified moderate likely significant effect to static gear in

terms of temporary loss and alteration to fishing grounds and displacement of fishing activity. It is unclear what is being proposed to mitigate this. It is important for the local fishing industry that reasonable mitigations are made to minimise impact on fishing activities. For example, many vessels switch between gear types seasonally, which should be considered when scheduling works. Eastern IFCA can assist with further dialogue with local fishers if required to further understand the location and seasonality of fishing activities.

- 1.3. The development of a Fisheries Liaison and Coexistence Plan is encouraged. Eastern IFCA can assist with this if necessary, but it is for the fishing industry and the applicant to agree on appropriate and effective mitigation. Notwithstanding this, it may be noteworthy that it has previously been observed that payments of compensation in the past have resulted in fishers using the money to purchase more fishing gear, increasing effort elsewhere. Potential impacts as a result of any increased effort resulting from compensation payments should be assessed as to effects on features of MPAs (if appropriate) and on fishers already operating in those areas.
- 1.4. Whilst the impact on benthic ecology has been assessed by the applicant, we would like to emphasise the importance of assessing this in the context of commercial fish stocks and the potential impact on local and small-scale fisheries. The cable route intersects multiple designated sites, negative impacts on these have potential to undermine existing or future management measures placed on fisheries to protect the designated features of these areas.

2. Issues relating to cables and EMF

- 2.1. Whilst the Applicant has assessed the potential impacts of electro-magnetic fields (EMF), Eastern IFCA maintain that not enough is known about electro-magnetic field impacts on marine fauna, particularly the cumulative effects of multiple cable routes. This position is informed by studies such as Hutchinson et al. 2020¹. We do not consider this can be addressed by a single developer; instead, there is responsibility for the marine cable industry to investigate and conduct research to better understand impacts from EMFs on marine organisms. However, we note that for every new electricity cable that is laid, the potential for cumulative impacts increases. This is of particular concern in the southern North Sea which already contains a high number of wind farm cables and electricity interconnector cables that could be impacting marine species, including commercial fish and shellfish.

¹ Hutchinson ZL, Gill AB, Sigray P, He H, King JW. Anthropogenic electromagnetic fields (EMF) influence the behaviour of bottom-dwelling marine species. *Sci Rep.* 2020 Mar 6;10(1):4219. doi: 10.1038/s41598-020-60793-x. PMID: 32144341; PMCID: PMC7060209.

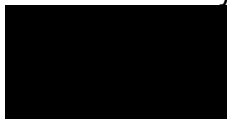
3. Potential for compensatory measures

3.1. Whilst we have not seen compensatory measures (such as use of the Marine Recovery Fund (MRF)) suggested for this project so far, Eastern IFCA wishes to state its position should they be required:

- *Eastern IFCA will actively engage in exploring opportunities for environmental compensatory measures but will not support measures that will have an overall adverse impact upon fishing activities and opportunities (agreed at the 41st Eastern IFCA Meeting held on 9 September 2020).*
- *Reliance on the MRF implies that the compensatory measures may encompass actions that are not aligned with the Authority's established position.*

If compensatory measures are required, potential impacts should be considered in terms of their impact on fisheries, including loss of fishing opportunities and adding to spatial squeeze on inshore fishers.

Yours sincerely,



Marine Science Officer

Eastern Inshore Fisheries and Conservation Authority